

From: (b) (6) >
Sent: Wednesday, September 07, 2016 1:41 AM
To: HarborComments
Subject: Superfund Harbor Cleanup Comment

Dear US EPA,

The clean-up plan for the Portland Harbor Superfund (aka CERCLA) sites misses the ball, and needs a number of revisions. A partial cleanup is inadequate to protect future generations, and is frankly a waste of funds.

Firstly, the EPA should extend the public comment period by 120 days to allow sufficient time for community and native groups to research and respond in full to the extensive plan.

1. Please remove the contamination in at least the amounts listed here:

- a. 571.7 acres by dredging
- b. 184.7 acres of capping
- c. 19.5 acres of Enhanced Monitored Recovery
- d. 1,391 acres of Monitored Natural Recovery

These amounts are revisions from the current proposed plan, called Alternative I, which relies mostly on monitored natural recovery for 1,876 of the nearly 2,200 acres of the site. The plan calls for 150 acres to be dredged, 17 acres to be dredged then capped and 64 acres to be capped with a confining layer of plastic or other material. Alternative I is insufficient.

2. I want to emphasize the need for the above levels of construction, plus modifications to include additional acres of dredging where we think toxicity levels, public usage or other factors warrant additional dredging. A partial cleanup is inadequate to protect future generations.

3. Please remove the contamination completely from the river and do not put it back in a different area of the river. Instead, please place it in a proper facility like the Roosevelt or Wasco Facilities. Recontamination would render the upcoming efforts wasted and would not adequately restore river useability.

4. Please monitor the air and water quality during cleanup to protect the neighbors, workers, and wildlife.

5. When completed, I want healthy fish in the 11 miles of the study area. "Healthy" is defined as entirely edible without an advisory. Institutional controls are not protective. The health of the fish must be verified according to the Oregon Health Authority.

6. In addition to other fish, lamprey must be included in the monitoring. Lamprey are a critical component in the local ecosystem and to native diets and culture. Peoples who depend on lamprey are especially susceptible to heavy metals that are not cleaned from the CERCLA sites, as heavy metals are bioaccumulated in fatty tissues and lamprey are highly fatty. Exclusion of lamprey monitoring and reporting is a direct dismissal of the local indigenous peoples and their large presence in the Portland region.

7. I encourage you to hold the polluters who caused the contamination, and profited from their ability to cheaply dump toxic waste into a public resource, to pay for the cleanup.

8. Please make the government representatives and entities adhere to the requests of the community in protection of the citizens and wildlife.

9. Failure to clean the river to a level at which fish are safe for human consumption renders the cleanup a classist and racist action: The populations that most heavily use the river are people who are homeless and Native American communities, as well as some of the Black communities that have already are subject to the most polluted areas of the city.

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STRONG
community action plan
for a livable, affordable
neighborhood



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